

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 19-CR-10081-IT
)	
GORDON ERNST, et al.,)	
Defendants.)	

**ASSENTED-TO MOTION BY THE UNITED STATES FOR AN EXTENSION OF TIME
TO FILE OPPOSITION TO DEFENDANT GORDON ERNST'S MOTION FOR ORDER
RELEASING SEIZED FUNDS**

The United States of America, by its attorney, Andrew E. Lelling, United States Attorney for the District of Massachusetts, respectfully requests an extension to April 17, 2019 to file an Opposition to the Defendant's Motion For Release of Seized Funds in the above-captioned matter. On April 1, 2019, Gordon Ernst filed, under seal, a Motion for Order Releasing Seized Funds for Necessary Living Expenses and Legal Defense, and a redacted version of the motion was later filed with the court on April 3, 2019. *See* Docket No. 130. Pursuant to L.R. 7.1(b)(2), a party is given 14 days to file an opposition to a motion, and the United States' motion would in the normal course be due on April 15, 2019. On April 9, 2019, the Court scheduled a motion hearing for April 17, 2019 and ordered that the United States file its response to the motion by close of business on April 12, 2019. *See* Docket No. 139. On April 10, 2019, the Court rescheduled the motion hearing for April 24, 2019, but did not change the shortened response due date. *See* Docket No. 146. The United States respectfully seeks leave file its response on April 17, 2019, which is two days after the response would be due under L.R. 7.1(b)(2) and a full week before the scheduled motion hearing. As reason for the extension, in addition to the 14-day time period provided by L.R. 7.1(b)(2), many members of the United States' trial team are traveling for business.

Pursuant to Local Rule 7.1, the United States had conferred with counsel for the Defendant and counsel assents to this motion.

Accordingly, the United States respectfully requests that it be permitted to file its response by April 17, 2019.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ Carol E. Head
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Dated: April 11, 2019

Certificate of Service

I hereby certify that the foregoing Motion, was filed through the Electronic Case Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

/s/ Carol E. Head
CAROL E. HEAD
Assistant U.S. Attorney

Dated: April 11, 2019